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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

MAY - 7 2001

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Amendment of Section 73.202(b),	)	MM Docket No. 01-69
Table of Allotments,	)	RM-10081
FM Broadcast Stations.	)	
(Parker, Arizona)	)	

TO: John A. Karousos, Chief  
Allocations Branch, Policy and Rules Division

COMMENTS AND COUNTERPROPOSAL

1. Farmworker Educational Radio Network, Inc.  
("Farmworker") hereby submits these Comments and Counterproposal  
in response to the Notice of Proposed Rule Making ("NPRM"),  
DA 01-693, released March 16, 2001, in the above-captioned  
proceeding. Farmworker holds a construction permit (File  
No. BPH-971003ME) authorizing construction of a new FM station on  
Channel 230C3 in Parker, Arizona. In the NPRM, the Commission  
proposed that Channel 247C3 be allotted to Parker, Arizona as its  
fourth local aural transmission service. Farmworker hereby

No. of Copies rec'd 0+4  
List A B C D E

counterproposes the following alternative allotments:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Kingman, Arizona	224C1, 234C, 261C2	224C1, 261C2
Parker, Arizona	230C3, 257C2, 247C3 <sup>1/</sup>	239C3, 248B1, 257C2
Searchlight, Nevada	--	234C0
Boulder City, Nevada	274C	274C <sup>2/</sup>
Caliente, Nevada	233C1	232C1
Henderson, Nevada	231C, 239C, 263C	230C, 239C, 263C
Baker, California	235B1, 268B	268B, 276B1

2. The counterproposal envisions the following changes:

- Channel 234C, Kingman, Arizona, which is currently used in the operation of Station KFLG-FM, would be moved to Channel 234C0 in Searchlight, Nevada.
- Channel 248B1 would be substituted for Channel 230C3, Parker, Arizona, which is currently specified in Farmworker's construction permit (File No. BPH-971003ME). This substitution is mutually exclusive with the proposal to allot Channel 247C3 to Parker, as set forth in the NPRM. However, to assure that, as envisioned in the NPRM, Parker is ultimately allotted three FM channels, the instant counterproposal also proposes the allotment of Channel 239C3 to Parker.
- Channel 230C would be substituted for Channel 231C in Henderson, Nevada, which is currently used in the operation of Station KMXB(FM).

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<sup>1/</sup> The allotment of Channel 247C3 to Parker is proposed in the captioned rule making proceeding.

<sup>2/</sup> While no change in the Boulder City channel is proposed, it is proposed to subject that channel to a site restriction.

- Channel 276B1 would be substituted for Channel 235B1 in Baker, California, which appears currently to be a construction permit associated with Station KKBK(FM).
- Channel 232C1 would be substituted for Channel 233C1 in Caliente, Nevada, which is currently a vacant allotment.
- Channel 274C in Boulder City, Nevada, would be unchanged, except for the imposition of a site restriction. That channel is currently used in the operation of Station KSTJ(FM). Undersigned counsel understands that, upon adoption of the channel allotments proposed herein, the licensee of Station KSTJ(FM) will submit an application proposing relocation of its transmitter consistent with these allotments.

An engineering statement demonstrating compliance with the Commission's channel allotment standards is included herewith.

3. These counterproposals are preferable to the allotment originally proposed in the NPRM. The original proposal would have resulted in the addition of a third local FM service to Parker. The counterproposals, by contrast, preserve the allotment of two channels to Parker, propose allotment of a third channel to Parker, and still provide a new service to Searchlight, which presently has no local radio service.

4. As described in the materials included as Attachment A hereto, Searchlight is a community of approximately 800 located midway between Las Vegas and Laughlin, Nevada. It has an elementary school (Grades 1-5), a volunteer fire and ambulance service, a justice of the peace and a State Fish and Game Warden. See Attachment A. It is served by a sub-station under the jurisdiction of the Las Vegas Metropolitan Police Department,

with two full-time officers resident in Searchlight and two Nevada Highway Patrolmen serving the Searchlight area. Id. The Searchlight Community Center houses the Medical Clinic, a branch of the Las Vegas/Clark County Library, the Searchlight Historic Museum, and other facilities. Id. Searchlight also has two churches, a full-service post office, and a senior citizens center, as well as a number of clubs and civic organizations (e.g., AMVETS, Shriners, Ladies Club, VFW, Museum Guild). Id. Although a number of translator stations are authorized to serve Searchlight, no full-service AM or FM radio stations are licensed to Searchlight.

5. Undersigned counsel has been advised that the licensees of Stations KSTJ(FM) and KFLG-FM have consented to the proposed changes. Since the Caliente, Nevada channel is presently vacant, no consent is necessary in connection with that aspect of the counterproposal. Appropriate reimbursement of reasonable expenses incurred in connection with the resulting changes will be made.

6. Upon approval of the counterproposal set out herein, Farmworker will seek to amend its authorization consistently with the approved changes and thereafter to construct and operate consistently with the amended authorization.

WHEREFORE, for the reasons stated, Farmworker requests that

the Commission's FM Table of Allotments be revised as follows:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Kingman, Arizona	224C1, 234C, 261C2	224C1, 261C2
Parker, Arizona	230C3, 257C2, 247C3 <sup>3/</sup>	239C3, 248B1, 257C2
Searchlight, Nevada	--	234C0
Boulder City, Nevada	274C	274C
Caliente, Nevada	233C1	232C1
Henderson, Nevada	231C, 239C, 263C	230C, 239C, 263C
Baker, California	235B1, 268B	268B, 276B1

Respectfully submitted,



/s/ Anne Thomas Paxson  
Anne Thomas Paxson

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(202) 296-4800

Counsel for Farmworker Educational  
Radio Network, Inc.

May 7, 2001

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<sup>3/</sup> The allotment of Channel 247C3 to Parker is proposed in the captioned rule making proceeding.

ATTACHMENT A

# SEARCHLIGHT, NV

**100 YEARS OLD!**

**1898 - 1998**

**The best kept secrets in Nevada - Searchlight & Cottonwood Cove Resort on Lake Mohave**

The background midi music on this page is the SEARCHLIGHT RAG written by Scott Joplin.

**The Centennial Celebration WAS hosted by the Searchlight Museum Guild and the Citizens of Searchlight.**



For the Centennial Celebration, a Bell/Bow Theater was set up to show movies of former Searchlight residents, Clara Bow and Rex Bell and Senator Harry Reid was on hand to meet with his constituents and sign copies of his books. Judy Paxton and her band provided live entertainment and a variety of other entertainment was provided as well.

There was something of interest happening during the entire celebration! So if you missed it... well, you missed out 'cause we only have this party once every hundred years!!! BUT... Searchlight is still a great place to visit. It is often referred to as one of the best kept secrets in Nevada.

This historic and beautiful mining town sits just fourteen miles up-hill from beautiful Cottonwood Cove on Lake Mohave. (Tell the truth... did you know there was a lake out in the middle of the desert between Vegas and Laughlin? In fact, did you know the Colorado River forms this lake? Hmmm...)

And I'll tell you another little-known secret... Searchlight has a pretty cool 4th of July celebration every year... so if you don't think you can make it for the bi-centennial (100 years from now) - you might want to stop by Searchlight in July... or any other time you are just looking for a beautiful, peaceful and serene place to visit. Trust me... no hustle, bustle in the streets of Searchlight... I think

that might be because we don't have many streets. :-) But we do have big-horn sheep, coyotes, desert tortoise, roadrunners, deer, jack rabbits, wild burros (do NOT try to pet them) and some of the most beautiful sunrises and sunsets that God has ever created - on a daily basis. and did I mention the desert flowers? the cactus? the hot springs? the mountains? the quiet coves? the waterfalls?

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Searchlight is situated in the Colorado River Basin in Clark County, Nevada. Located on U.S. 95 and State Route 164, midway between Las Vegas and Laughlin. Elevation is 3,540 feet.



### A BRIEF HISTORY OF SEARCHLIGHT

Searchlight has a most interesting and intriguing history that includes many famous names: Clara Bow, Rex Bell, Edith Head, Louis Meyer, LT William Nellis, U.S. Senator Harry Reid, John Macready, James Cashman, and an endless list of colorful and fascinating characters that are fodder for the legends of the old west.

Scott Joplin, who never lived in Searchlight, was so intrigued by the stories of his composer friend, Tom Turpin - who had spent time in Searchlight in his youth - that he composed the Searchlight Rag.

Initial discoveries of predominately gold ore were first made at this location on May 6, 1897. G. F. Colton filed the first claim, later to become the Duplex Mine.

The Searchlight Mining District was founded July 20, 1898. The Quartette Mining Company, formed in 1900, became the mainstay of the Searchlight District, producing almost half of the area's total output. In May, 1902, a 16-mile narrow-gauge railroad was built down the hill to the company's mill



on the Colorado River.

The Searchlight Post Office was established in October 1898. Searchlight began to boom in 1902 and reached its peak year in 1907. Up to 1940 total production amounted to \$4.5 million. On March 31, 1907, the 23.22-mile Barnwell and Searchlight Railroad connected the town with the then main Santa Fe line from Needles to Mojave. By 1919 trains were operating over the B and S Railroad only twice a week. A severe washout on September 23, 1923, halted traffic completely. Train service was never restored.

In the 1900's, Searchlight was a typical busy mining town of a reported 1,500 people. At this time, they were larger than Las Vegas. There were many gold and silver mines that were good producers in the Searchlight mining district. The "Mines of Searchlight" map dated October 1906, shows that there were well over 300 mining claims in the area at that time. Eventually, the gold and silver production cost went up and the grade of ore went down, so people started to move on. By 1927, there were about 50 people left in Searchlight.

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### SEARCHLIGHT TODAY

Today the Searchlight community has approximately 800 residents and about 50% of them are retired. The other 50% are an eclectic mix of miners, ranchers, small business owners and artists.

Searchlight has the Harry Reid Elementary School (named in honor of the US Senator) which serves grades 1 through 5. Searchlight also has a sub-station under the jurisdiction of the Las Vegas Metropolitan Police Department, with two full-time officers who reside in Searchlight and two Nevada Highway Patrolmen serve the Searchlight area. There is a Justice of the Peace, The Honorable Judge Wendell Turner, and a State Fish & Game Warden to serve the community.

Searchlight has a volunteer fire and ambulance service. There are two fire trucks that can respond to an area of 20 miles in all directions and there is also an ambulance which is manned by certified volunteers.

The Searchlight Community Center was dedicated in October 1989. The center houses the Medical Clinic, a branch of the Las Vegas/Clark County Library, the Searchlight Historic Museum, office of Clark County Parks and Recreation Representative, meeting rooms, multi-purpose rooms and a kitchen.

There are two churches, a full service post office and a senior citizens center. The center offers a TV, ceramic kiln, pool table, card tables, classes in ceramics, sewing and quilting. Porcelain and painting classes are also offered. Bingo and cards games are held once a week. The seniors support their building expenses with bake sales, rummage sales, and raffles.

There are several clubs and organizations available in the community. AMVETS, Roadrunners, Shriners, Ladies Club, Senior Citizens Club, VFW, Art & Craft Guild and the Museum Guild.

Searchlight is the *Gateway to Lake Mohave*. Only fourteen miles *down* the hill is beautiful Cottonwood Cove, one of the best Large Mouth Bass fisheries in the West. The Cottonwood Cove Resort and Marina is located inside Lake Mead National Recreation Area, administered by the National Park Service. Campgrounds, fuel, a cafe', marina store and motel are available. Searchlight and it's surrounding areas are appealing to those who love nature and the outdoors. The quaint and peaceful desert community of Searchlight - just minutes away from beautiful Cottonwood Cove on Lake Mohave, definitely IS one of the best kept secrets in Nevada.

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JOHN J. MULLANEY  
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**MULLANEY ENGINEERING, INC.**

9049 SHADY GROVE COURT  
GAITHERSBURG, MD 20877

**ENGINEERING EXHIBIT EE-RM:**

**COUNTERPROPOSAL - MM DOC 01-69**

**RULE MAKING TO AMEND  
FM TABLE OF ALLOTMENTS**

**SUBSTITUTION OF CH. 248B1 FOR 230C3 AT PARKER, AZ  
ALLOTMENT OF CH. 239C3 IN LIEU OF 247C3 AT PARKER, AZ  
SUBSTITUTION OF CH. 276B1 FOR 235B1 AT BAKER, CA  
SUBSTITUTION OF CH. 232C1 FOR 233C1 AT CALIENTE, CA  
SUBSTITUTION OF CH. 230C FOR 231C AT HENDERSON, NZ  
ALLOTMENT OF CH. 234C0 AT SEARCHLIGHT, NV**

**MAY 7, 2001**

Prepared on behalf of

Farmworker Educational Radio Network, Inc.

**MULLANEY ENGINEERING, INC.****Declaration**

I, John J. Mullaney, declare and state that I am a graduate electrical engineer with a B.E.E.E. and my qualifications are known to the Federal Communications Commission, and that I am an principal engineer in the firm of Mullaney Engineering, Inc., and that I have provided engineering services in the area of telecommunications since 1977. My qualifications as an expert in radio engineering are a matter of record with the Federal Communications Commission.

The firm of Mullaney Engineering, Inc., has been requested to prepare the instant engineering exhibit in support of a counter proposal in MM Docket 01-69 regarding the allotment of a new FM channel to Parker, Arizona.

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

/s/ John J. Mullaney

John J. Mullaney, Consulting Engineer

Executed on the 7th day of Map 2001

**MULLANEY ENGINEERING, INC.****ENGINEERING EXHIBIT EE-RM:****COUNTERPROPOSAL - MM DOC 01-69****RULE MAKING TO AMEND  
FM TABLE OF ALLOTMENTS**

**SUBSTITUTION OF CH. 248B1 FOR 230C3 AT PARKER, AZ  
ALLOTMENT OF CH. 239C3 IN LIEU OF 247C3 AT PARKER, AZ  
SUBSTITUTION OF CH. 276B1 FOR 235B1 AT BAKER, CA  
SUBSTITUTION OF CH. 232C1 FOR 233C1 AT CALIENTE, CA  
SUBSTITUTION OF CH. 230C FOR 231C AT HENDERSON, NV  
ALLOTMENT OF CH. 234C0 AT SEARCHLIGHT, NV**

**NARRATIVE STATEMENT:**

This engineering statement has been prepared in support of a counter proposal in MM Docket 01-69 which proposes the allotment of Channel 247C3 at Parker, Arizona. The purpose of this statement is to provide engineering in support of a rule making petition to amend the FM Table of Allotments and when appropriate to modify the license of the station affected as follows:

Substitution of Ch. 248B1 for 230C3 at Parker, AZ, for use by permittee Farmworker Educational Radio Network, Inc.

Allotment of Ch. 239C3 in lieu of 247C3 at Parker, AZ, pending RM proposal in MM Docket 01-69.

Substitution of Ch. 276B1 for 235B1 at Baker, CA, for use by permittee of KKBK.

Substitution of Ch. 232C1 for 233C1 at Caliente, CA, - Vacant Allotment.

Substitution of Ch. 230C for 231C at Henderson, NV, for use by licensee of KMXB.

Allotment of Ch. 234C0 at Searchlight, NV, for use by licensee of KFLG and the deletion of 234C from Kingman, AZ.

Counterproposal - MM Doc 01-69  
Allotment of Ch. 278C3 to Eutaw & 282A to Moundville, AL  
April 2001

**MULLANEY ENGINEERING, INC.**

Several of the proposed changes involve communities within 290 kilometers of the of a United States Border and, therefore, Mexican concurrence is required.

### **Technical Proposal**

Figures 1 to 7 are channel allocation studies for each of the proposals using whatever site is appropriate. Each of the proposals are close enough to their respective city of license to provide a city grade signal. The following specific comments are provided:

Figure 1 - Ch. 248B1 proposes a site located in California, 12 km north of Parker, AZ. Since the class of the channel is governed by where the proposed site is to be located the allotment must be a Class B1 facility since it will be in California. (34-15-20 / 114-17-20)

Figure 2 - Ch. 239C3 uses the city reference coordinates for Parker, AZ, thus, mooted the need for a site restriction as proposed in the NPRM. (34-08-49 / 114-17-10)

Figure 3 - Ch. 276B1 uses the official CP coordinates of KKBK.

Figure 4 - Ch. 274C uses an area where KSTJ has agreed to file a change of site application upon completion of the RM. This site is just 7.7 km away from its current site and easily provides city grade service. (36-00-30 / 115-00-20)

Figure 5 - Ch. 232C1 uses the same reference point as that currently used for 233C1.

Counterproposal - MM Doc 01-69  
Allotment of Ch. 278C3 to Eutaw & 282A to Moundville, AL  
April 2001

**MULLANEY ENGINEERING, INC.**

Figure 6 - Ch. 230C uses the currently licensed site of KMXB.

Figure 7 - Ch. 234C0 uses a special reference point desired by KFLG (Site: 35-56-30 / 115-03-01). It is located 54.2 km from Searchlight, NV (City: 35-27-55 / 114-55-08). A C0 facility has a city grade reference distance of 59 km and thus, the proposed site easily provides city grade service.

Farmworker Educational Radio Network, Inc., believes that the proposed changes to the table of allotments will result in a preferential arrangement of allotments and therefore, serves the public interest. If granted, Farmworker will quickly file an CP application for operation on 248B1 and will see that other licensees similarly file as needed.

/s/ John J. Mullaney

John J. Mullaney, Consulting Engineer

May 7, 2001.

**MULLANEY ENGINEERING, INC.****ENGINEERING EXHIBIT EE-RM:****COUNTERPROPOSAL - MM DOC 01-69****RULE MAKING TO AMEND  
FM TABLE OF ALLOTMENTS****TABLE OF CONTENTS:**

1. Declaration of Engineer
2. Narrative Statement
3. Figure 1, Channel Allocation Study for Ch. 248B1 - Farmworker  
From Special Ref. Point for Parker, AZ.
4. Figure 2, Channel Allocation Study for Ch. 239C3 - RM  
From City Ref. Point for Parker, AZ.
5. Figure 3, Channel Allocation Study for Ch. 276B1 - KKBK  
From CP Ref. Point for Baker, CA.
6. Figure 4, Channel Allocation Study for Ch. 274C - KSTJ.  
From Special Ref. Point for Boulder City, AZ.
7. Figure 5, Channel Allocation Study for Ch. 232C1 - VAC.  
From Allotment Ref. Point for Caliente, NV.
8. Figure 6, Channel Allocation Study for Ch. 230C - KMXB.  
From License Ref. Point for Henderson, NV.
9. Figure 7, Channel Allocation Study for Ch. 234C0 - KFLG.  
From Special Ref. Point for Searchlight, NV.



**FIGURE 1**  
MAY 2001

**FIGURE 2**  
MAY 2001

**FIGURE 3**  
**MAY 2001**

\*\*\*\*\* FM CHANNEL STUDY NO. 1 - MULLANEY ENGINEERING, INC. GAITHERSBURG, MARYLAND - 7-MAY-01 10:41:26 \*\*\*\*\*  
 \*\*\*\*\* LAST UPDATE: 010506 \*\*\*\*\*

KSTJ	274 C	FR	POLARIZATION	ERP (KW)	HAAT	RCAMSL
BOULDER CITY NV	US			HOR PLN	BM TILT	(METER)
36.0030	115.0020	(D.MMSS)	102.7 MHz	HORIZONTAL	100.000	0.000
				VERTICAL	100.000	0.000
					600.0	1294.8
					600.0	1294.8

THE FOLLOWING CONTOURS ARE CALCULATED USING:

ERP= 100.000 (KW) 20.0 (DBK) HAAT= 600.0 (METERS)

CALCULATED HAAT FROM TOPO DATA BASE

INTERFERING	DOMESTIC	AZIMUTH	HAAT	HAAT	CONTOURS (KM)
	DBU KM	DEGREES	(METERS)	(FEET)	70 DBU 60 DBU
CO CHANNEL ( 40.0)	197.8	0.0	759.7	2492.5	73.5 98.0
1ST ADJACENT ( 54.0)	136.6	45.0	724.9	2378.1	72.3 96.6
2ND ADJACENT ( 80.0)	50.4	90.0	515.1	1689.9	63.2 87.6
3RD ADJACENT (100.0)	13.7	135.0	597.9	1961.7	67.6 91.7
		180.0	500.8	1643.1	62.2 86.8
		225.0	390.8	1282.1	55.7 79.1
PROTECTED ( 60.0)	91.8	270.0	606.1	1988.6	67.9 92.1
		315.0	704.6	2311.8	71.6 95.8
CITY GRADE ( 70.0)	67.7	AVERAGE	600.0	1968.5	67.7 91.8

\*\*\*\*\*  
 \*\*\*THE MEXICAN BORDER IS 366.0 KM ON A BEARING OF 175.8 DEG. TRUE\*\*\*  
 \*\*\*\*\*

AZIMUTH	FROM	TO	CALL	STS	FILE NUMBER	CITY	ST C	LAT	LONG	REL CHN	ERP (KW)	HAAT D	IR	IC	REZLT
								(D.MMSS)			HORZ VERT	(M) A	DIST (KM)	RSEP (KM)	RSEP (KM)
316.9	136.4			ADD	RM	INDIAN SP	NV A	36.4141	115.4837	2ND 272C	H	V	105.0	105.	s
316.9	136.4			ADD	RM	INDIAN SP	NV A	36.4142	115.4837	2ND 276C	H	V	105.0	105.	s
216.7	36.1			VAC	RM9696	LUDLOW	CA A	34.4321	116.1004	1ST 273A	H	V	177.5	165.	
235.4	53.7	KIIS-F	LIC	BLH5361	LOS ANGEL	CA A	34.1336	118.0357	CO 274B	8H	8V	902D	341.9	274.	
164.3	344.4	KBYE	LIC	BLH910808KA	BULLHEAD	AZ A	35.1456	114.4437	CO 274C	53H	53V	734	TO 289C	87.5	290.
96.2	276.3			VAC	RM9696	BOULDER C	NV A	35.5945	114.5151	CO 274C	H	V	12.8	290.	-
205.8	25.8	KSTJ	CP	BPH000922AD	BOULDER C	NV A	35.5646	115.0234	CO 274C	99B	99B	603	7.7	290.	-
261.5	79.9	KSSI	LIC	BLH950410KG	CHINA LAK	CA A	35.3906	117.4058	CO 274A	3H	3V	-7	245.1	226.	
109.0	291.1	KQST	LIC	BLH961028KC	SEDONA	AZ A	34.5805	111.3029	1ST 275C	100B	100B	437	337.7	241.	
49.2	230.2			VAC		HURRICANE	UT A	37.1030	113.1724	1ST 275C3	H	V	200.8	176.	

DISTANCE (MILES)	DISTANCE (KM)	CALL	LOCATION	FREQ. (KHZ)	COORDINATES	FILE NO.	AZIMUTH FROM TO
3.56	5.73	KDOX	HENDERSON	NV US 1280 Lic	ND1 Day 36-03-13N 114-58-30W	BL	28.6 208.6

**CHANNEL ALLOCATION STUDY FOR CH. 274C -  
 KSTJ. FROM SPECIAL REF. POINT FOR BOULDER  
 CITY, AZ**

COUNTERPROPOSAL - MM DOC 01 - 69

**MULLANEY ENGINEERING, INC.  
 GAITHERSBURG, MARYLAND**

**FIGURE 4  
 MAY 2001**

\*\*\*\*\* FM CHANNEL STUDY NO. 1 - MULLANEY ENGINEERING, INC. GAITHERSBURG, MARYLAND - 7-MAY-01 10:41:48 \*\*\*\*\*  
 \*\*\*\*\* LAST UPDATE: 010506 \*\*\*\*\*

FCC REF.	232 C1	FA	POLARIZATION	ERP (KW)	HAAT	RCMSL
CALIENTE NV US		VACANT		HOR PLN	BM TILT	(METER)
37.3654 114.3048 (D.MMSS)	94.3 MHz		HORIZONTAL	100.000	0.000	299.0
			VERTICAL	0.000	0.000	0.0

THE FOLLOWING CONTOURS ARE CALCULATED USING:

ERP= 100.000 (KW) 20.0 (DBK) HAAT= 299.0 (METERS)

CALCULATED HAAT FROM TOPO DATA BASE

INTERFERING	DOMESTIC
	DBU KM
CO CHANNEL ( 40.0)	171.9
1ST ADJACENT ( 54.0)	105.0
2ND ADJACENT ( 80.0)	33.7
3RD ADJACENT (100.0)	10.1
PROTECTED ( 60.0)	72.3
CITY GRADE ( 70.0)	50.0

AZIMUTH	HAAT	HAAT	CONTOURS (KM)	
DEGREES	(METERS)	(FEET)	70 DBU	60 DBU
0.0	310.1	1017.5	50.8	73.1
45.0	436.6	1432.3	58.3	82.5
90.0	391.7	1285.0	55.8	79.1
135.0	241.6	792.7	46.1	67.6
180.0	150.4	493.4	38.3	58.5
225.0	402.1	1319.2	56.4	79.9
270.0	208.7	684.8	43.7	64.6
315.0	250.7	822.6	46.7	68.3
AVERAGE	299.0	981.0	50.0	72.3

EST SITE ELEVATION : 1347.9 m.; 4422.4 ft.

EST RAD CENTER AGL : 578.8 m.; 1898.8 ft.

RAD CENTER A.M.S.L.: 1926.7 m.; 6321.2 ft.

\*\*\*\*\*

AZIMUTH	FROM	TO	CALL	STS	FILE NUMBER	CITY	ST C	LAT	LONG	REL CHN	ERP (KW)	HAAT D	IR	IC	REZLT
								(D.MMSS)			HORZ VERT	(M) A	DIST	RSEP	RSEP
													(KM)	(KM)	(KM)
194.0	13.7	KMXB	LIC	BMLH951120KF	HENDERSON NV A	36.0026	115.0024	1ST 231C	100H 100V	369	OK	183.8	209.		S
193.9	13.6	KMXB	CP	BPH991005AB	HENDERSON NV A	36.0030	115.0020	1ST 231C	100B 100B	354	OK	183.6	209.		S
218.4	36.9	KDUC	LIC	BLH911031KC	BARSTOW CA A	34.5815	117.0222	CO 232B1	4.6H 4.6V	239		370.9	233.		
0.0	0.0		VAC		CALIENTE NV A	37.3654	114.3048	1ST 233C1	H V			0.0	177.		-
82.0	262.8	KBRE-F	LIC	BLH890717KF	CEDAR CIT UT A	37.4551	113.0615	3RD 235C1	55H 55V	-37		125.4	82.		
87.8	268.5	KBRE-F	USE		CEDAR CIT UT A	37.3841	113.2228	3RD 235C1	H V			100.6	82.		

\*\*\*\*\*

THERE WERE 0 AM STATIONS WITHIN 6.43 KM (4 MI) OF THE FM REFERENCE COORDINATES

NOTE: KMBX BEING MOVED TO CH. 230C AT LIC SITE

**CHANNEL ALLOCATION STUDY FOR CH. 232C1 -  
 VAC. FROM ALLOTMENT REF. POINT FOR  
 CALIENTE, NV.**

COUNTERPROPOSAL - MM DOC 01 - 69

**MULLANEY ENGINEERING, INC.  
 GAITHERSBURG, MARYLAND**

**FIGURE 5  
 MAY 2001**

\*\*\*\*\* FM CHANNEL STUDY NO. 1 - MULLANEY ENGINEERING, INC. GAITHERSBURG, MARYLAND - 7-MAY-01 10:22:46 \*\*\*\*\*  
 \*\*\*\*\* LAST UPDATE: 010506 \*\*\*\*\*

KMXB	BMLH951120KF	230 C	FM	POLARIZATION	ERP (KW)	HAAT	RCAMSL
HENDERSON NV	US		LIC		HOR PLN	BM TILT	(METER)
	36.0026	115.0024 (D.MMSS)	93.9 MHz	HORIZONTAL	100.000	0.000	369.0
INFINITY RADIO LICENSE INC.				VERTICAL	100.000	0.000	369.0
							1050

THE FOLLOWING CONTOURS ARE CALCULATED USING:

CALCULATED HAAT FROM TOPO DATA BASE

ERP= 100.000 (KW) 20.0 (DBK) HAAT= 353.6 (METERS)

INTERFERING	DOMESTIC	AZIMUTH	HAAT	HAAT	CONTOURS (KM)
	DBU KM <td>DEGREES <td>(METERS) <td>(FEET) <td>70 DBU 60 DBU</td> </td></td></td>	DEGREES <td>(METERS) <td>(FEET) <td>70 DBU 60 DBU</td> </td></td>	(METERS) <td>(FEET) <td>70 DBU 60 DBU</td> </td>	(FEET) <td>70 DBU 60 DBU</td>	70 DBU 60 DBU
CO CHANNEL ( 40.0)	178.5	0.0	517.6	1698.1	63.3 87.8
1ST ADJACENT ( 54.0)	112.2	45.0	477.6	1567.0	60.7 85.3
2ND ADJACENT ( 80.0)	37.0	90.0	267.9	878.8	47.9 69.7
3RD ADJACENT (100.0)	11.0	135.0	353.3	1159.2	53.6 76.3
		180.0	252.0	826.7	46.8 68.4
		225.0	145.2	476.3	37.7 57.8
PROTECTED ( 60.0)	76.3	270.0	358.0	1174.7	53.8 76.7
		315.0	457.5	1500.8	59.5 84.0
CITY GRADE ( 70.0)	53.6	AVERAGE	353.6	1160.2	53.6 76.3

\*\*\*THE MEXICAN BORDER IS 365.9 KM ON A BEARING OF 175.8 DEG. TRUE\*\*\*

AZIMUTH	FROM	TO	CALL	STS	FILE NUMBER	CITY	ST C	LAT	LONG	REL CHN	ERP (KW)	HAAT D	IR	IC	REZLT
								(D.MMSS)			HORZ VERT	(M) A	DIST	RSEP	RSEP IR IC
													(KM)	(KM)	(KM)
151.7	332.0	KADD	LIC	BLH971104KG	LAUGHLIN	NV A	35.0158	114.2157	2ND 228C1	2.75H2.75V	576		122.7	105.	
55.0	235.9	KSNN	LIC	BLH991105AA	SAINT GEO	UT A	36.5049	113.2928	2ND 228C2	2.4H 2.4V	577		164.8	105.	
204.7	24.0	KCLB-F	LIC	BLH940317KA	COACHELLA	CA A	33.4807	116.1327	1ST 229B	26.5H26.5V	197		268.8	217.	
41.9	223.7	KCYQ	LIC	BLH961107KA	RICHFIELD	UT A	38.3230	112.0331	1ST 229C	41H 41V	879		384.0	241.	
109.0	291.0	KMGH	LIC	BMLH940818KG	FLAGSTAFF	AZ A	34.5808	111.3028	CO 230C	100B 100B	460		337.8	290.	
162.5	342.9	971003	CP	BPH971003ME	PARKER	AZ A	34.0830	114.1750	CO 230C3	10H 10V	-46	OK	216.8	237.	S
235.6	53.8	KZLA-F	LIC	BLH910802KA	LOS ANGEL	CA A	34.1357	118.0418	CO 230B	18.5H 16V	956D		341.8	274.	
260.5	78.3	KISV	LIC	BLH960516KB	BAKERSFIE	CA A	35.2617	118.4422	1ST 231B	4.5H 4.5V	406		343.6	217.	
0.0	0.0	KMXB	LIC	BMLH951120KF	HENDERSON	NV A	36.0026	115.0024	1ST 231C	100H 100V	369		0.0	241.	-
39.0	219.0	KMXB	CP	BPH991005AB	HENDERSON	NV A	36.0030	115.0020	1ST 231C	100B 100B	354		0.2	241.	-
30.4	210.6	KBHQ	APP	BMPH000524AA	MOAPA VAL	NV A	36.4057	114.3046	IF 284C1	100B 100B	299		87.1	41.	
30.4	210.6	KBHQ	VAC		MOAPA VAL	NV A	36.4057	114.3046	IF 284C1	H V			87.1	41.	

DISTANCE	DISTANCE	CALL	LOCATION	FREQ.	COORDINATES	FILE NO.	AZIMUTH
(MILES)	(KM)			(KHZ)			FROM TO
3.66	5.89	KDOX	HENDERSON	NV US 1280 Lic	ND1 Day 36-03-13N 114-58-30W	BL	28.9 208.9

Note: Parker CP moving to Ch. 248B1 34-15-20 / 114-17-20

**CHANNEL ALLOCATION STUDY FOR CH. 230C -  
 KMXB. FROM LICENSE REF. POINT FOR  
 HENDERSON, NV.**

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**MULLANEY ENGINEERING, INC.  
 GAITHERSBURG, MARYLAND**

**FIGURE 6  
 MAY 2001**

\*\*\*\*\* FM CHANNEL STUDY NO. 1 - MULLANEY ENGINEERING, INC. GAITHERSBURG, MARYLAND - 7-MAY-01 10:26:48 \*\*\*\*\*  
 \*\*\*\*\* LAST UPDATE: 010506 \*\*\*\*\*

KFLG	234 C0	FR	POLARIZATION	ERP (KW)	HAAT	RCAMSL
SEARCHLIGHT NV	US			HOR PLN	BM TILT	(METER)
35.5650 115.0301 (D.MMSS)	94.7 MHz		HORIZONTAL	100.000	0.000	450.0
			VERTICAL	100.000	0.000	450.0
						1242.7

THE FOLLOWING CONTOURS ARE CALCULATED USING:

ERP= 100.000 (KW) 20.0 (DBK) HAAT= 450.0 (METERS)

CALCULATED HAAT FROM TOPO DATA BASE

INTERFERING	DOMESTIC	AZIMUTH	HAAT	HAAT	CONTOURS (KM)
	DBU KM	DEGREES	(METERS)	(FEET)	70 DBU 60 DBU
CO CHANNEL ( 40.0)	187.1	0.0	587.8	1928.3	67.2 91.3
1ST ADJACENT ( 54.0)	124.0	45.0	522.2	1713.1	63.6 88.0
2ND ADJACENT ( 80.0)	42.6	90.0	487.6	1599.7	61.4 86.0
3RD ADJACENT (100.0)	12.1	135.0	590.7	1938.1	67.3 91.5
		180.0	214.0	702.1	44.1 65.1
		225.0	255.6	838.7	47.0 68.7
PROTECTED ( 60.0)	83.4	270.0	407.5	1337.0	56.7 80.3
		315.0	534.6	1754.0	64.5 88.8
CITY GRADE ( 70.0)	59.1	AVERAGE	450.0	1476.4	59.1 83.4

\*\*\*\*\*  
 \*\*\*THE MEXICAN BORDER IS 359.5 KM ON A BEARING OF 175.3 DEG. TRUE\*\*\*  
 \*\*\*\*\*

AZIMUTH	LAT	LONG	ERP (KW)	HAAT D	IR	IC	REZLT
FROM TO CALL STS	FILE NUMBER CITY	ST C (D.MMSS)	REL CHN	HORZ VERT (M) A	DIST RSEP (KM)	RSEP (KM)	IR IC (KM)
30.5 210.5 KMBX LIC	BMLH951120KF HENDERSON NV	A 36.0026 115.0024	3RD 231C	100H 100V 369	OK	7.7 105.	S
30.6 210.6 KMBX CP	BPH991005AB HENDERSON NV	A 36.0030 115.0020	3RD 231C	100B 100B 354	OK	7.9 105.	S
14.3 194.6 VAC	CALIENTE NV	A 37.3654 114.3048	1ST 233C1	H V	OK	191.2 196.	S
209.0 28.2 KLOB LIC	BLH001020AB THOUSAND CA	A 33.5156 116.2558	CO 234A	1.65H1.65V 195D		263.2 215.	
235.9 54.2 KTWV LIC	BMLH960718KC LOS ANGEL CA	A 34.1329 118.0347	CO 234B	58B 58B 863		334.7 272.	
131.1 311.8 KFLG-F LIC	BLH870511KB KINGMAN AZ	A 35.0640 113.5308	CO 234C	46H 46V 760		140.6 281.	-
148.4 328.8 KFLG-F CP	BPH990714IL KINGMAN AZ	A 35.0158 114.2157	CO 234C1	17H 17V 571E		119.0 259.	-
234.5 54.0 KKBK CP	BPH971107MS BAKER CA	A 35.2610 115.5525	1ST 235B1	1H 1V 399E	OK	97.3 180.	S
40.0 221.2 KBRE-F LIC	BLH890717KF CEDAR CIT UT	A 37.4551 113.0615	1ST 235C1	55H 55V -37		266.0 196.	
287.8 107.2 KNYE CP	BPH951102MD PAHRUMP NV	A 36.1152 116.0208	2ND 236A	6H 6V -68		93.0 86.	C
287.8 107.2 KNYE APP	BMPH010319AB PAHRUMP NV	A 36.1152 116.0208	2ND 236A	6B 6B -27		93.0 86.	C
72.1 252.2 KSTJ LIC	BLH890306KB BOULDER C NV	A 35.5945 114.5151	IF 288C2	3.7H 3.7V 484D	TO 274C	17.6 31.	S

THERE WERE 0 AM STATIONS WITHIN 6.43 KM (4 MI) OF THE FM REFERENCE COORDINATES

NOTE: KMBX BEING MOVED TO CH. 230C AT LIC SITE  
 CALIENTE BEING MOVED TO CH. 232C1 AT REF SITE  
 KKBK BEING MOVED TO CH. 276B1 AT CP SITE

**CHANNEL ALLOCATION STUDY FOR CH. 234C0 -  
 KFLG. FROM SPECIAL REF. POINT FOR  
 SEARCHLIGHT, NV.**

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**MULLANEY ENGINEERING, INC.  
 GAITHERSBURG, MARYLAND**

**FIGURE 7  
 MAY 2001**

**CERTIFICATE OF SERVICE**

I, J. Martin Tansey, hereby certify that on this 7th day of May, 2001, I caused copies of the foregoing "Comments and Counterproposal" to be placed in the U.S. Postal Service, first class postage prepaid, or hand delivered (as indicated below), addressed to the following persons:

R. Barthen Gorman, Esquire  
Allocations Branch, Policy and  
Rules Division  
Mass Media Bureau  
Federal Communications Commission  
445 12th Street, S.W. - Room 3-A224  
Washington, D.C. 20554  
(By Hand)

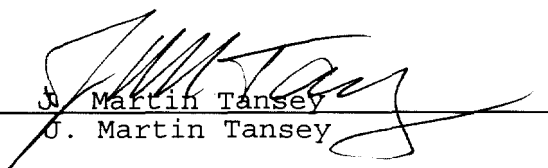
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(licensee of KFLG-FM)

/s/   
J. Martin Tansey